

**IN THE UNITED STATE COURT OF APPEALS
FOR THE FIFTH CIRCUIT**

**IN RE: *EX PARTE* APPLICATION OF
LAURA ZUNIGA CACERES, BERTHA
ZUNGIA CACERES, AND SALVADOR
ZUNGIA CACERES FOR THE ASSISTANCE
BEFORE A FOREIGN TRIBUNAL**

No. 20-60463

TANYA ROMERO-BACCA,

Appellant.

UNOPPOSED MOTION TO SUPPLEMENT RECORD ON APPEAL

I. Introduction:

Pursuant to [Fed. R. App. P. 10](#) (e) (2) (C), Tanya Romero-Baca, moves to supplement the Record on Appeal filed herein to include the following documents which were omitted:

1. Response in Opposition to Motion to Stay Proceedings Pending Appeal [Doc. 46];
2. Reply to Response in Opposition to Motion to Stay Proceedings Pending Appeal [Doc. 47]; and
3. Order Denying Motion to Stay Proceedings [Doc. 48].

Opposing Counsel has no objections to this motion and has previously consented to a Stipulation to Correct the Record on Appeal filed on July 1, 2020, with the United States District Court for the Southern District of Mississippi [Doc. 51], a copy of which is attached hereto as Exhibit “A”.

II. Conclusion

For the foregoing reasons, Ms. Romero-Baca has shown good cause and asks that the Record on Appeal be supplemented with the omitted documents identified herein.

RESPECTFULLY SUBMITTED, this the 2nd day of July, 2020.

**Attorneys for Interested Party, Tanya
Romero-Baca**

WEBB SANDERS & WILLIAMS, P.L.L.C.
363 NORTH BROADWAY
POST OFFICE BOX 496
TUPELO, MISSISSIPPI 38802
TELEPHONE: (662) 844-2137
B. WAYNE WILLIAMS, MSB #9769
wwilliams@webbsanders.com
NORMA CARR RUFF, MSB #5721
nruff@webbsanders.com

BY: /s/ Norma Carr Ruff
NORMA CARR RUFF

LEWIS ROCA ROTHGERBER CHRISTIE
LLP
201 East Washington Street, Suite 1200
Phoenix, AZ 85004-2595
Telephone: 602-262-5337
Randy Papetti (AZ State Bar No. 014586
rpapetti@lrrc.com
Jared Sutton (AZ State Bar No. 028887)
jsutton@lrrc.com
Jennifer Lee-Cota (AZ State Bar No.
033190)
jlee-cota@lrrc.com

CERTIFICATE OF SERVICE

I, Norma Carr Ruff, one of the attorneys for Tanya Romero-Baca, do hereby certify that I have this date filed the above and foregoing *Unopposed Motion to Supplement Record on Appeal* using the Court's electronic filing system which in turn served a true and correct copy of the same to counsel of record as follows:

Amelia S. McGowan, Esq.
Mississippi Center for Justice
P.O. Box 1023
Jackson, Mississippi 39215
amcgowan@mscenterforjustice.org

Leo P. Cunningham, Esq.
Ralitza S. Dineva, Esq.
Sean P. Killeen, Esq.
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, California 94304-1050
lcunningham@wsgr.com
rdineva@wsgr.com
skilleen@wsgr.com

Roxanna Altholz, Esq.
INTERNATIONAL HUMAN RIGHTS LAW
CLINIC, UNIVERSITY OF CALIFORNIA
BERKELEY
489 Simon Hall,
Berkeley, California 94720
raltholz@law.berkeley.edu

This the 2nd day of July, 2020.

/s/ Norma Carr Ruff
NORMA CARR RUFF

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g), I hereby certify that this document complies with the type-volume limit of Federal Rules of Appellate Procedure 27(d)(2)(A) because, excluding the parties of the document exempted by Federal Rule of Appellate Procedure 32(f), this document contains 162 words. I further certify that this document complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Federal Rule of Appellate Procedure 32(a)(6) because this document has been prepared using Microsoft Word in Times New Roman 14-point font, which is a proportionally-spaced font.

/s/ Norma Carr Ruff
NORMA CARR RUFF

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

IN RE: *EX PARTE* APPLICATION OF)
LAURA ZÚNIGA CÁCERES, BERTHA)
ZÚNIGA CÁCERES, AND SALVADOR)
ZÚNIGA CÁCERES FOR ASSISTANCE)
BEFORE A FOREIGN TRIBUNAL)
_____)

CASE NO.: 1:19-mc-00405-KS-RHW

STIPULATION TO CORRECT RECORD ON APPEAL

It is hereby stipulated and agreed by the parties pursuant to Fed. R. App. P. 10 (e) (2) (A) that the Record on Appeal filed in Case No. 20-60463 is incomplete and should be supplemented to include the following:

1. Response in Opposition to Motion to Stay Proceedings Pending Appeal [Doc. 46];
2. Reply to Response in Opposition to Motion to Stay Proceedings Pending Appeal [Doc. 47]; and
3. Order Denying Motion to Stay Proceedings [Doc. 48].

RESPECTFULLY SUBMITTED, on this the 1st day of July, 2020.

/s/ Amelia S. McGowan

AMELIA S. MCGOWAN, MSB 103610
MISSISSIPPI CENTER FOR JUSTICE
P.O. BOX 1023
JACKSON, MISSISSIPPI 39215
amcgowan@mscenterforjustice.org
Attorneys for Applicants, Laura Zúniga
Cáceres, Bertha Zúniga Cáceres, and
Salvador Zúniga Cáceres

/s/ Norma Carr Ruff

NORMA CARR RUFF, MSB 5721
WEBB SANDERS & WILLIAMS, P.L.L.C.
363 NORTH BROADWAY
POST OFFICE BOX 496
TUPELO, MISSISSIPPI 38802
TELEPHONE: (662) 844-2137
nruff@webbsanders.com
Attorneys for Interested Party, Tanya
Romero-Baca